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*Attorney for Defendants*  
*Case Peter VanVeen and*  
*Case VanVeen dba Lazevee Farms, Inc.*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

MARIA GARCIA HERNANDEZ,  
Plaintiff,

vs.

CASE PETER VANVEEN, an individual;  
CASE VANVEEN, dba LAZEVEE FARMS,  
INC., a California corporation; DOES I  
through V, inclusive, and ROE  
CORPORATIONS I through V, inclusive,  
Defendants.

CASE NO. 2:14-cv-01493-JCM-CWH

**STIPULATION AND [PROPOSED] ORDER  
TO STAY THE CASE**

**STIPULATION AND PROPOSED ORDER**

Pursuant to Local Rules 6-1 and 26-4, the parties, by and through their respective attorneys of record, stipulate and agree to stay the pendency of this case by forty five days (45) day and to continue the deadline for the parties to file their Joint Pre-Trial order an additional sixty (60) days.

This Court has previously granted five extensions for the parties to complete the Joint Pre-Trial Order. The Joint Pre-Trial Order is currently due on February 28, 2018, pursuant to the most recent Stipulation and Order signed by the Court on February 9, 2018. [Doc. No. 164] The most recent Stipulation was sought by the parties in order to allow for substantive settlement negotiations to proceed with the hopes of resolving this matter. The settlement negotiations are ongoing, and the stay will permit

1 the parties to continuing discussions as well as permit Plaintiff to address related issues with third parties  
2 that must be resolved as part of the potential settlement.

3 For these reasons, and in order to avoid potentially unnecessary additional fees and costs if this  
4 matter settles, the parties hereby stipulate stay this case forty-five (45) days, or April 9, 2018 and  
5 continue the deadline for the parties to submit their Joint Pre-Trial order an additional sixty (60) days, or  
6 until April 24, 2018.

7 Accordingly, the parties have agreed and stipulated to the following deadline:

8 Case Stayed Until: **April 9, 2018**

9 Final Joint Pre Trial Order to be filed by: **April 24, 2018**

10 Dated: February 23, 2018	Dated: February 23, 2018
11 HALL JAFFE & CLAYTON	CHRISTIANSSEN LAW OFFICES
12	
13 <u>/s/ Steven T. Jaffe</u>	<u>/s/ Todd Terry</u>
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Attorney for Defendants	Attorney for Plaintiff
Case Peter VanVeen and	
Case VanVeen dba Lazevee Farms, Inc.	

20 **~~PROPOSED~~ ORDER**

21 In accordance with the stipulation of the parties, the Court orders as follows:

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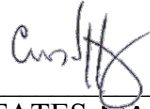
Case Stayed Until:

**April 9, 2018**

Final Joint Pre Trial Order to be filed by:

**April 24, 2018**

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

Dated: February 27, 2018